

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

BARBARA SCHNEIDER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 06-C-345
	)	
TSYS TOTAL DEBT MANAGEMENT,	)	
INC.,	)	
	)	<b>Hon. William E. Callahan</b>
Defendant.	)	

**DECLARATION OF ROBERT K. O'REILLY IN  
SUPPORT OF PETITION FOR AWARD OF FEES**

I, Robert O'Reilly, state under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. Exhibit 1 truthfully reflects the time spent by Ademi & O'Reilly, LLP on the above captioned matters, with total hours in the amount of 49.20 hours.
2. Exhibit 1 truthfully reflects expenses incurred by Ademi & O'Reilly, LLP on the above captioned matters, with total expenses in the amount of \$270.00.
3. Exhibit 2 is the firm biography for Ademi & O'Reilly, LLP.
4. My current market billing rate on litigation matters is \$325.00 per hour. This rate is used in non-contingency fee matters, including *Garmo v. Naimi*, 04-cv-1915 (Racine); *Beal Bank SSB v. N & G, LLC* (Racine); *Fox v. Guhring, Inc.*, Adv. Pro. No. 04-A-00585 (Bankr. N.D. Ill.); *Unifund CRR v. Scarpace*, 05-sc-377 (Ozaukee); and *Great Seneca v. Grulke*, 06-sc-1011 (Milwaukee). Associates in this firm charge between \$230 and \$300 per hour on these market billing rate cases, depending on years of experience.
5. The firm's standard hourly billing rates are nearly the same as those explicitly approved by the Court last year in *Waliszewski v. Amsher Collection Services, Inc.*, No. 05-C-

942-PGJ (E.D. Wis. Nov. 9, 2006), and to those used by the firm in numerous other recent cases within this District in which final approval of attorneys' fees was granted. *See Dickman v. Phillips & Cohen Assoicates, Ltd.*, Case No. 05-cv-319; *Brown, et al. v. Penncro Associates, Inc.*, Case No. 05-cv-775; *Zerba v. NCO Financial Systems, Inc.*, Case No. 05-C-1019; *Deal, et al. v. NCO Financial Systems, Inc.*, Case No. 05-C-1315; *Czerwinski v. EMCC, Inc.*, Case No. 05-cv-1316; *Winfrey, et al. v. NCO Financial Systems, Inc.*, Case No. 05-C-1321; *Berther v. Ameriquet Recovery Services, LLC*, Case No. 06-C-287.

6. The firm's standard hourly billing rates are the same as those used in the fee petitions for *Beattie and Calvin v. The Westmoreland Agency and Capital One, F.S. B.*, Case No. 05-cv-310; *Medina v. The Westmoreland Agency and Capital One Bank*, Case No. 05-cv-1074; *Berther v. TSYs Total Debt Management, Inc.*, Case No. 05-cv-293; and *Ewald v. West Asset Management, Inc.*, 05-cv-1320, which were recently approved by another Court in this District.

7. The instant case was taken on a contingency fee basis, with no guarantee that Plaintiff's counsel would recover anything through this litigation.

8. Consumer protection litigation under the Fair Debt Collection Practices is a specialized field, with few similarities to other litigation. Ademi & O'Reilly, LLP is one of the most active practitioners in this field of law, having filed several hundred class action and individual lawsuits based on the Fair Debt Collection Practices Act.

9. The experience, reputation, and expertise of Ademi & O'Reilly, LLP substantially contributed to the efficient and fair resolution of this case.

Dated this 7th Day of November 2007

S/ Robert K. O'Reilly  
Robert O'Reilly (SBN 1027032)